

AO 106 (Rev. 04/10) Application for a Search Warrant (Modified: WAWD 10-26-18)

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CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

## UNITED STATES DISTRICT COURT

for the  
Western District of Washington

In the Matter of the Search of  
*(Briefly describe the property to be searched  
 or identify the person by name and address)*  
 SUBJECT PREMISES, more fully described in  
 Attachment A

Case No.

MJ19-5230

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

SUBJECT PREMISES, more fully described in Attachment A, incorporated herein by reference.

located in the Western District of Washington, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B, incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;  
☒ contraband, fruits of crime, or other items illegally possessed;  
☒ property designed for use, intended for use, or used in committing a crime;  
☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

## Code Section

Title 18 U.S.C. § 2421A  
 Title 18 U.S.C. § 1952  
 Title 18 U.S.C. § 1591  
 Title 18 U.S.C. § 1956

## Offense Description

Transporting an individual interstate with intent to engage in prostitution;  
 Facilitating, managing, and promoting a prostitution enterprise;  
 Sex trafficking;  
 Money laundering.

The application is based on these facts:

- ☒ See Affidavit of Scott McGeachy, IRS SA, continued on the attached sheet.

☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

Pursuant to Fed. R. Crim. P. 4.1, this warrant is presented: ☒ by reliable electronic means; or ☐ telephonically recorded.

*(Signature)*  
 Applicant's Signature

Scott McGeachy, IRS Special Agent  
 Printed name and title

- ☐ The foregoing affidavit was sworn to before me and signed in my presence, or  
☒ The above-named agent provided a sworn statement attesting to the truth of the foregoing affidavit by telephone.

Date: 11/18/2019

*(Signature)*  
 Judge's signature

City and state: Tacoma, Washington

David W. Christel, United States Magistrate Judge  
 Printed name and title

**AFFIDAVIT**

1  
2 STATE OF WASHINGTON )  
3 ) ss  
4 COUNTY OF CLARK )

5 I, Scott McGeachy, a Special Agent with the Internal Revenue Service Criminal  
6 Investigation, Portland, Oregon, being first duly sworn, hereby depose and state as  
7 follows:

**INTRODUCTION AND AGENT BACKGROUND**

8  
9 1. I am a Special Agent employed by the Internal Revenue Service (IRS),  
10 Criminal Investigation, and have held this position for over eighteen years. I have  
11 successfully completed the eleven-week Criminal Investigator Training Course at the  
12 Federal Law Enforcement Training Center and the sixteen-week Special Agent Basic  
13 Training course put on by the Internal Revenue Service. During this time I have either  
14 conducted or been involved in investigations concerning Title 26 (Income Tax), Title 18  
15 (Conspiracy and Money Laundering), and Title 31 (Bank Secrecy Act) violations by  
16 individuals involved in both legal and illegal occupations.

17 2. I have written and/or directly been involved in writing over two hundred  
18 five search and/or seizure warrants and have participated in the execution of numerous  
19 federal search warrants involving criminal income tax charges, money laundering,  
20 narcotics violations, and other criminal activities during which evidence of criminal  
21 violations was seized. For the past twelve years I have predominantly worked  
22 investigations involving narcotics trafficking and money laundering. Many of these  
23 narcotics investigations also involved aspects of human trafficking including the  
24 transportation of individuals across state lines to commit prostitution as well as the  
25 laundering of prostitution proceeds. Through my training, experience, and conversations  
26 with other law enforcement officers who specialize in human trafficking and sex  
27 trafficking, I am familiar with the subculture of sex-traffickers, that is collectively known  
28

1 as "the game" and or "the life." Based on my training and experience, I also know that  
2 this subculture uses and maintains its own set of rules and language, as well as *modus*  
3 *operandi*, which I outlined at the conclusion of this affidavit.

4 **PURPOSE OF AFFIDAVIT**

5 3. This affidavit is submitted in support of an application under Rule 41 of the  
6 Federal Rules of Criminal Procedure for a warrant to search the premises located at  
7 **Regency Apartments, 11301 SE 10th Street, #Q111, Vancouver, WA 98664** (the  
8 "SUBJECT PREMISES") as further described in Attachment A, attached hereto and  
9 incorporated by this reference as if set forth fully herein. As set forth below, there is  
10 probable cause to believe that the SUBJECT PREMISES contains evidence, fruits and  
11 instrumentalities of the following crimes: transporting an individual interstate with intent  
12 to engage in prostitution in violation of Title 18 U.S.C. § 2421A; facilitating, managing,  
13 and promoting a prostitution enterprise in violation of Title 18 U.S.C. § 1952; sex  
14 trafficking in violation of Title 18 U.S.C. § 1591; and money laundering in violation of  
15 Title 18 U.S.C. § 1956.

16 4. I further request to present this application telephonically pursuant to  
17 Federal Rules of Criminal Procedure Rule 4.1 because I am based in Portland, Oregon.

18 5. This affidavit is intended to show only that there is sufficient probable  
19 cause for the requested warrant and does not set forth all of my knowledge about this  
20 matter. The facts set forth in this affidavit are based on my own personal knowledge,  
21 knowledge obtained from other individuals during my participation in this investigation,  
22 including other law enforcement officers, interviews of witnesses, a review of records  
23 related to this investigation, communications with others who have knowledge of the  
24 events and circumstances described herein, and information gained through my training  
25 and experience.

**SUMMARY OF PROBABLE CAUSE**

6. Portland Police Bureau, Portland FBI, and IRS-CI (referred to collectively as "Investigators") are investigating Steven Caleb NEWCOMB for numerous violations of federal law, including money laundering, facilitating prostitution, facilitating and managing a prostitution enterprise and sex trafficking. This investigation has revealed that NEWCOMB has trafficked multiple different women since at least 2016.

7. Investigators believe NEWCOMB currently traffics at least four women for the purpose of prostitution in the Portland metro area—to include Passionate Baker (who resides at the SUBJECT PREMISES in Washington), Ladeja Nelson (the mother of NEWCOMB's child),<sup>1</sup> A.G., and K.C.<sup>2</sup>

8. NEWCOMB's modus operandi for his sex trafficking enterprise is to instruct these women to open bank accounts in their own names at Rivermark Credit Union. NEWCOMB and/or the women then book hotel rooms for purposes of prostitution through Priceline.com using funds from these credit union/bank accounts. Nelson, Baker, and A.G. then use these rooms for prostitution activity. NEWCOMB and/or these women deposit proceeds from prostitution activity into the credit union/bank accounts to facilitate further prostitution activity. And the cycle then continues. By utilizing the credit union/bank accounts of the women, instead of his own, NEWCOMB is able to disguise the proceeds of his illegal activity. NEWCOMB also appears to have disguised his illegal activity by having Nelson and Baker purchase vehicles in their own names, which NEWCOMB then used, and by using rental cars.

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<sup>1</sup> Detective Kenneth Reynolds of the Portland Police Bureau interviewed Ladeja Nelson's mother, Stephanie Avington, on June 25, 2019. Avington said that Ladeja Nelson is the mother of NEWCOMB's child.

<sup>2</sup> I believe A.G. and K.C. were eighteen years old at the time NEWCOMB began to traffic them. Currently, I have no evidence NEWCOMB trafficked them as minors, but I refer to them only by their initials out of an abundance of caution.

1           9.     In June 2019, Investigators seized a phone that contained explicit text  
2 messages between NEWCOMB and Nelson discussing prostitution activity. At that time,  
3 the mothers of both Nelson and A.G. told Investigators that their daughters were being  
4 pimped by NEWCOMB.

5           10.    More recently, Investigators reviewed numerous postings through October  
6 31, 2019, in which Nelson, A.G. or K.C. or some combination of the three women were  
7 advertised for prostitution.

8           11.    Further confirming investigators' belief that NEWCOMB continues to  
9 traffic these women are recent toll records for NEWCOMB's cellular telephone. In sum,  
10 between the dates of August 31, 2019 and October 16, 2019, Baker is NEWCOMB's top  
11 caller including multiple phone contacts between NEWCOMB and Baker on several  
12 September 2019 dates on which Baker rented local area hotel rooms in Clackamas, OR.

13           12.    Investigators believe that NEWCOMB splits his time between two  
14 locations – the SUBJECT PREMISES in Vancouver, WA, which is the apartment of  
15 Passionate Baker, and a residence in Clackamas, OR (the "Lawnfield Apartment"), which  
16 is used by Nelson. With respect to the SUBJECT PREMISES, court-authorized GPS  
17 pings on NEWCOMB's telephone indicate that NEWCOMB spent multiple nights at the  
18 SUBJECT PREMISES between October 15, 2019 and the present.

19           13.    Given the evidence that NEWCOMB is and has previously trafficked  
20 Baker, Nelson, A.G., and K.C., Investigators believe that a search of the SUBJECT  
21 PREMISES will reveal historic and current evidence of the aforementioned crimes, to  
22 include among other items, hotel or other travel receipts; money orders used to launder  
23 illicit proceeds; records and documentation related to assets such as vehicles that have  
24 been purchased to disguise unlawful proceeds from prostitution; records and  
25 documentation related to payment accounts, to include PayPal, VENMO, prepaid cards,  
26 or debit/credit cards; prostitution-related postings or advertisements; and electronic  
27  
28

1 devices used by NEWCOMB and Baker, Nelson, A.G. or K.C. to communicate about  
 2 prostitution, post ads related to prostitution, or book travel for purposes of prostitution.

3 **Evidence of NEWCOMB's Historical Sex Trafficking**

4 14. On March 28, 2018, Hon. John V. Acosta, United States Magistrate for the  
 5 District of Oregon, authorized a search warrant for twenty-three electronic devices seized  
 6 from the search of two premises in a separate investigation of Johnell Cleveland, a  
 7 distributor of counterfeit oxycodone pills, in the Portland, Oregon metropolitan area. As  
 8 described below, one of the searched phones, an LG Tribute 5 cellphone, belonged to  
 9 NEWCOMB.

10 *Sex Trafficking November 12, 2016 through February 15, 2017*

11 15. On June 11, 2018 I reviewed the forensic download of the LG Cellphone  
 12 and identified the user of the cellular telephone as Steven NEWCOMB. I drew this  
 13 conclusion because: (1) the LG Cellphone includes numerous videos and pictures of  
 14 NEWCOMB consistent with him being the user of the device; (2) one of the email  
 15 accounts associated with the phone is Steven.Newcomb94@gmail.com; and (3) the user  
 16 of the LG Cellphone sent a text message on November 28, 2016, identifying himself as  
 17 "Steven caleb Newcomb." I identified NEWCOMB in the LG Cellphone videos and  
 18 pictures based on NEWCOMB's Oregon Department of Licensing photograph.

19 16. Upon identifying the user as NEWCOMB, I then reviewed text messages  
 20 contained on LG Cellphone for the time period of November 12, 2016 through February  
 21 15, 2017 and identified multiple pertinent text messages as well as photographs  
 22 demonstrating NEWCOMB's involvement in sex trafficking.

23 17. For example, on December 9, 2016, between 5:59pm and 6:52pm, UM-  
 24 7363 exchanged a series of text messages with NEWCOMB regarding prostituting a  
 25 female who works for NEWCOMB:

26 UM-7363: A cuddy this Mexican dude at my job he own his own janitorial  
 27 service I told him you got a bad ass hoe he said money not a  
 28 problem he wont it i told him.

1 UM-7363: ill ask u on god he aint playing  
 2 NEWCOMB: Just call me when you get a chance  
 3 UM-7363: Ok  
 4 UM-7363: 971 322 3826  
 5 UM-7363: He said can u have her send him a pic to his phone

6 18. Based on my training and experience, I believe that UM-7363 informed  
 7 NEWCOMB that he has a potential client (a john) who will pay NEWCOMB for a date  
 8 with NEWCOMB's girl. NEWCOMB told UM-7363 to call him. UM-7363 then texted  
 9 NEWCOMB a phone number and asked for a picture of the female for the client before  
 10 engaging in the date.

11 19. On December 12, 2016, UM-7363 told NEWCOMB that NEWCOMB's  
 12 prostitute did not call his co-worker, saying "Cuddy that Mexican nigga just came to me  
 13 im on lunch he said wassup she didn't call him." NEWCOMB texted him back that he  
 14 forgot, "Oh yea I 4." I queried (971) 322-3826 and identified an individual with the  
 15 initials of M.G. that owns and operates a janitorial service in the Portland metro area,  
 16 which is consistent with the text messages.

17 20. On January 6, 2017, between 12:28pm and 11:42pm, an unidentified  
 18 female user of (928) 249-4719 (hereinafter, "UF-4719") texted back and forth with  
 19 NEWCOMB regarding her location and date with an unknown male at the Econo Lodge  
 20 off of Sandy Boulevard, Portland Oregon, as follows:

21 UF-4719: Daddy what are you doing?! When are you coming?  
 22 UF-4719: I have to be there at 8 he said  
 23 NEWCOMB: k  
 24 UF-4719: FWD: So i just got checked in. im at the econo lodge on Sandy.  
 25 [Approximately an hour and a half passed]  
 26 NEWCOMB: ?  
 27 UF-4719: im good were just talking  
 28 NEWCOMB: How much longer  
 UF-4719: 12  
 NEWCOMB: Minutes?  
 UF-4719: That time a midnight  
 NEWCOMB: k

1 NEWCOMB: An Candice sent me a date

2 UF-4719: k

3 UF-4719: He only pulled out 240

4 NEWCOMB: You've been in there for 2hrs tho so I dont understand

5 UF-4719: Almost 2 hrs

6 UF-4719: I Told you we been talking . Ill tell you when I get in the car .

7 NEWCOMB: Yup

8 UF-4719: Where are u

9 21. Based on my training and experience, I believe that NEWCOMB used UF-  
10 4719 to prostitute at the Econo Lodge off of Sandy Boulevard. The conversation  
11 indicates that NEWCOMB gave UF-4719 a ride to the Econo Lodge. NEWCOMB then  
12 checked in with UF-4719 to see when she would be done, presumably so that  
13 NEWCOMB could pick UF-4719 up. I believe "240" to be a reference to \$240, the price  
14 that the john paid for UF-4719. I know from my training and experience that a sex  
15 trafficker who prostitutes women for financial gain will often drive the women to a hotel  
16 and check them in and will often keep tabs on them throughout the night for safety and  
17 security reasons. The sex trafficker will often pick up the woman after her date and  
18 collect the money. I know in this scenario UF-4719 calls NEWCOMB "daddy," which is  
19 indicative of a classic pimp/prostitute relationship.

20 22. In addition to text conversations that indicated sex trafficking, I also  
21 identified Snapchat videos and photographs of NEWCOMB displaying large amounts of  
22 cash, which I believe are proceeds of NEWCOMB's illicit activity.

23 23. I reviewed a photograph taken of NEWCOMB on November 20, 2016, in  
24 which NEWCOMB cradles several stacks of cash like a baby and has loose cash spread  
25 out all over a kitchen table:  
26  
27  
28



24. I reviewed a Snapchat message sent from NEWCOMB to Cleveland on December 4, 2016, in which NEWCOMB stands in front of a Mercedes-Benz with a red bow on the hood. NEWCOMB holds cash spread out like a fan and the caption on the Snapchat message to Cleveland is, "Now go buy one bitch."

25. Another photograph of NEWCOMB from 2016 shows him seated in the driver's seat of a vehicle. NEWCOMB holds \$100 bills like a fan and additional \$100 bills are arrayed along the perimeter of the window of the vehicle. NEWCOMB also displays several pieces of jewelry in the photograph, including a watch, a ring, and a tennis bracelet:

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26. I reviewed a Snapchat video dated February 7, 2017, in which an individual displayed several stacks of cash folded in half, banded together with rubber bands. The caption on the video stated “no fall off lol.” I believe that NEWCOMB, the user of LG Cellphone, displayed large amounts of cash earned from illicit activity and that he Snapchatted the video with the caption to indicate that he has not ceased his illicit money-making activity, (“no fall off lol.”).<sup>3</sup> The conspicuous displays of cash and wealth coupled with the text messages related to prostitution are consistent with NEWCOMB’s historical sex trafficking.

*Sex Trafficking of Nelson June 2017 through February 2018*

27. On May 31, 2019, Hon. John V. Acosta, U.S. Magistrate Judge for the District of Oregon authorized search warrants for the three cellular telephones (White Cellphone, Black Cellphone, and Purple Flip Phone) seized from a Mercedes-Benz

<sup>3</sup> The LG Cellphone also contained text messages that showed NEWCOMB’s involvement in distributing oxycodone or counterfeit oxycodone pills. As a result, I do not know whether the money that NEWCOMB displayed in the pictures above is from drugs rather than sex trafficking.

1 during a May 25, 2019 traffic stop of NEWCOMB. This 2011 black Mercedes-Benz  
2 E350 is titled in the name of Ladeja Nelson.

3 28. On June 5, 2019, I completed a forensic review of the White Cellphone and  
4 the Black Cellphone, which had been found in the trunk (identified by NEWCOMB as  
5 belonging to his girlfriend). During my review of both phones, I noted extensive  
6 messaging between Ladeja Nelson and multiple "johns" consistent with prostitution-  
7 related activity up until in November 2018 when Nelson ceased using the phones.  
8 Furthermore, I also noted text messages between NEWCOMB and Nelson that show  
9 NEWCOMB drove Nelson to meet locations, including interstate, for prostitution activity  
10 and collected money from Nelson from Nelson's prostitution-related activity. Nelson had  
11 a phone number (503) 519-5263 listed as "Steven" in her phone (hereinafter, referred to  
12 as "NEWCOMB-5263"). I further reviewed various text messages between Nelson and  
13 NEWCOMB-5263 regarding Nelson's earnings from her prostitution work, which is  
14 consistent with my belief that NEWCOMB is the user of (503) 519-5263 and trafficking  
15 Nelson.

16 29. For example, on June 30, 2017, Kerry LNU (last name unknown) texted  
17 Nelson, "Can u catch a flight if there's one available," to which Nelson responds "yes."  
18 Kerry subsequently booked a flight on Alaska Airlines from Portland International  
19 Airport (PDX) to Seattle-Tacoma International Airport (SEA), departing at 9:55pm and  
20 arriving at 10:45pm, which was sent to Nelson via text. At 11:31pm, Nelson texted  
21 NEWCOMB-5263 that he (NEWCOMB) "better pray for me a safe flight because they  
22 are having mechanical issues with this plane." This furthers my belief that NEWCOMB  
23 traffics Nelson, because Nelson let NEWCOMB know of her status on the trip to Seattle,  
24 WA.

25 30. On July 1, 2017, at 12:24am, Kerry texted Nelson, "3<sup>rd</sup> floor parking for  
26 pick up." Nelson responded to Kerry that she was in the Uber. On July 1, 2017 at  
27 9:02am, Nelson texted NEWCOMB-5263, "He has the rest on him. He had it on him the  
28

1 whole time. There was no way to get it. But he had someone here when i came so I got a  
 2 watch too. I couldn't find the other one." NEWCOMB-5263 asked Nelson, "How much  
 3 money did he give you." Nelson responded "1000" and then texted NEWCOMB-5263  
 4 "and im out."

5 31. Based on this series of text messages, I believe Kerry is a john that called  
 6 Nelson. Nelson then flew from Portland, OR to Seattle, WA for prostitution. Nelson  
 7 texted NEWCOMB upon completion of the date that she had earned \$1,000 and was  
 8 leaving her date. I believe this is consistent with a pimp/prostitute relationship where the  
 9 prostitute lets the pimp know her location, earnings from her date, and when she departs  
 10 from the john's location.

11 **NEWCOMB's Use of Bank Accounts at Rivermark Community Credit Union Bank**  
 12 **To Promote Prostitution and Conceal Illicit Proceeds**

13 32. As detailed below, A.G., Baker, and Nelson each opened up bank accounts  
 14 at Rivermark Community Credit Union Bank which appear to be used for purposes of  
 15 prostitution. For all three women, evidence demonstrates NEWCOMB's involvement  
 16 with opening the account, although Investigators believe that NEWCOMB had the  
 17 women use accounts in their own names to distance himself from illicit activity.  
 18 Analysis of each bank account demonstrates a pattern of use which is consistent with  
 19 prostitution. Specifically, the accounts all show repeated cash deposits by either the  
 20 women or NEWCOMB, followed by multiple Priceline.com hotel bookings. The hotel  
 21 bookings are frequently for different hotels, all within the Washington and Oregon area,  
 22 despite the fact that each of these women maintains a residence. The price for each  
 23 booking appears consistent with a one-night hotel stay, furthering investigators' belief  
 24 that the bookings are for purposes of prostitution. I know that individuals involved in  
 25 prostitution will often rent local area motel/hotel rooms at different locations on a  
 26 continual basis. As explained below, A.G. and Nelson's accounts closed as of March and  
 27  
 28

1 August 2019, but Baker continues to use her account (as of September 2019) in a manner  
2 that remains consistent with prostitution.

3 33. Based on the subpoenaed bank records described below, as well as those  
4 held in the name of Steven NEWCOMB for the time period of November 2017 through  
5 April 2018, I have been unable to identify any consistent legitimate source of income for  
6 NEWCOMB, Baker, Nelson, K.C. or A.G. I have found some explicit images of the  
7 women online which appear to have been taken at a strip club, so it is possible that they  
8 may earn some funds via employment as exotic dancers.<sup>4</sup>

9 *Nelson's Bank Account*

10 34. Investigators learned that on December 22, 2014, Ladeja Nelson, born in  
11 1995, opened an account at Rivermark Community Credit Union. When Nelson opened  
12 the account in December 2014, Nelson listed NEWCOMB as the beneficiary and listed  
13 her employment as self-employed. Rivermark Community Credit Union personnel stated  
14 that Nelson told bank personnel that her boyfriend was in the vehicle outside the credit  
15 union waiting for Nelson and that she really needed to take possession of a debit card so  
16 that she could immediately use the card, specifically at hotels.

17 35. I reviewed historical charges to Nelson's Rivermark Community Credit  
18 Union account membership number ending in XXX850-2 and noted numerous cash  
19 deposits as well as expenses for renting hotel rooms and rental cars, which are consistent  
20 with promoting prostitution and sex trafficking. The following is a sampling of the  
21 deposit/withdrawal activity related to cash deposits and hotel payments for the account of  
22 Ladeja Nelson:

23 12/3/2015 – Cash Deposit \$100  
24 12/23/2015 – Cash Deposit \$360  
25 12/24/2015 – Priceline Hotel - \$286.68

26  
27 <sup>4</sup> A June 25, 2019 Vancouver Police Department Report also lists Ladeja Nelson's employment  
28 at Sin Rock (adult entertainment club) at 12100 NE Glisan Street, Portland, Oregon; however,  
investigators have been unable to confirm that information to date.

1 01/20/2016 – Cash Deposit \$506  
 2 01/21/2016 - Enterprise Rent a Car - \$50.00  
 3 01/21/2016 – Priceline Hotel - \$120.87  
 4 01/26/2016 – Cash Deposit \$530  
 5 02/26/2016 – Cash Deposit \$500  
 6 03/04/2016 – Cash Deposit \$400  
 7 03/07/2016 – Priceline Hotel - \$281.98  
 8 03/09/2016 – Cash Deposit \$300  
 9 03/10/2016 – Priceline Hotel - \$116.10  
 10 03/24/2016 – Cash Deposit \$780  
 11 03/25/2016 – Cash Deposit \$130  
 12 03/25/2016 – Priceline Hotel \$148.74  
 13 03/28/2016 – Priceline Hotel - \$113.08  
 14 04/08/2016 – Cash Deposit \$400  
 15 04/08/2016 – Cash Deposit \$200  
 16 04/22/2016 – Priceline Hotel - \$214.52  
 17 05/23/2017 – Cash Deposit - \$500  
 18 05/24/2017 – Priceline Hotel - \$189.99  
 19 05/25/2017 – Hotel Rose, Portland, OR - \$146.15

20 36. Prior to January 31, 2019, the account activity in Nelson's Rivermark  
 21 Community Credit Union account was dormant for approximately eighteen months.  
 22 However, on January 31, 2019, the activity in Nelson's Rivermark Community Credit  
 23 Union resumed with a similar pattern of activity, which I believe to be consistent with  
 24 prostitution. Notably, in 2019, I found multiple instances of NEWCOMB depositing  
 25 money into Nelson's account, consistent with NEWCOMB trafficking Nelson for  
 26 purposes of prostitution.

27 37. On February 1, 2019, I saw a deposit of \$130 followed by a debit card  
 28 charge on February 1, 2019 at Priceline Hotels, Embassy Suites. I noted a debit card  
 charge for \$15.00 on February 4, 2019 at Embassy Suites Hotel, in Portland, Oregon,  
 suggesting to me that the earlier Priceline Hotels charge was for the Portland Embassy  
 Suites.

38. On February 18, 2019, there was a \$200 cash deposit followed by a  
 February 19, 2019 debit card charge of \$116.99 at the Sheraton Hotel. I reviewed

1 Rivermark Community Credit Union ATM photos and noted that Steven NEWCOMB  
2 deposited the \$200 cash into Nelson's bank account on February 18, 2019.

3 39. On March 1, 2019, a \$388 cash deposit was made into Nelson's Rivermark  
4 Community Credit Union account.

5 40. On March 2, 2019, there was a \$235.96 charge to Aloft in Portland,  
6 Oregon, which I know is a hotel located at Cascade Station in Portland, Oregon.

7 41. On March 5, 2019, a \$2,000 cash deposit was made into Nelson's  
8 Rivermark Community Credit Union account. On March 5, 2019, ATM surveillance  
9 photos show that NEWCOMB made the \$2,000 cash deposit into Nelson's bank account  
10 from a drive-up ATM, while driving a Hyundai Sonata OR/089LCT registered to  
11 Passionate Baker.<sup>5</sup>

12 42. Rivermark Community Credit Union informed me the account was closed  
13 on or about March 29, 2019.

14 43. On May 16, 2019, Nelson opened up a bank account with JP Morgan Chase  
15 Bank. I reviewed the deposit activity and noted that from May 16, 2019 until July 31,  
16 2019, Nelson deposited \$7,359 in cash. Furthermore, I noted on July 29, 2019, Nelson  
17 had a Priceline.com charge at The Porter Hotel in Portland, OR for \$195.48. Also on  
18 July 29, 2019 Nelson made two separate cash deposits for \$1,400 and \$630, which I  
19

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20 <sup>5</sup> Oregon Department of Motor Vehicles (DMV) records identify Baker as the only registered  
21 owner of a Hyundai Sonata bearing Oregon license plate OR/089LCT. I obtained the Gresham  
22 Toyota dealer jacket, which showed Baker as the only purchaser in October 2018, who placed  
23 \$1,000 cash down and financed the remaining balance of \$12,791.00. As part of the financing,  
24 Baker provided a copy of a pay stub as proof of income. Baker listed her employment at RPIC,  
25 Inc. with gross monthly pay of \$3,400 per month. I queried RPIC, Inc. through open source  
26 databases and was unable to locate a legitimate company with those initials. On January 5, 2019,  
27 Baker reported to PPB officers in an unrelated investigation that she recently purchased a  
28 Hyundai Sonata with NEWCOMB. Based on my training and experience, I believe that  
NEWCOMB used Baker's purchase of the Hyundai Sonata to conceal the source of \$1,000 cash.  
On April 22, 2019, the Honorable J. Richard Creatura, U.S. Magistrate Judge for the Western  
District of Washington signed a tracking warrant for the Hyundai Sonata.

1 believe is consistent with renting a hotel room for prostitution and subsequently  
 2 depositing the proceeds of the prostitution activity into Nelson's Chase Bank account.

3 44. Based on the aforementioned activity, I believe that NEWCOMB deposited  
 4 illicit funds into Nelson's account and had Nelson use the account to facilitate  
 5 prostitution.<sup>6</sup>

6 *Baker's Bank Account*

7 45. According to records provided by Rivermark Credit Union, Baker opened  
 8 her Rivermark Credit Union account (Member Number XXX1000-2) on March 29, 2017  
 9 and listed her employment as "self-employed." Starting in January 2018 and continuing  
 10 through April 30, 2018, I obtained several Rivermark Community Credit Union ATM  
 11 drive-up surveillance videos of Steven NEWCOMB operating Enterprise Rent-a-Car  
 12 vehicles and depositing cash into Passionate Baker's XXX1000-2 account. I believe,  
 13 based on my investigation, as well as the facts outlined in this affidavit that NEWCOMB  
 14 deposited illicit proceeds into this account to disguise the source of the funds.

15 46. I also reviewed records from Enterprise Rent-a-Car and identified that  
 16 NEWCOMB has regularly rented vehicles starting on January 4, 2018 continuing through  
 17 May 17, 2018 as follows: OR/001JET, OR/044KDK, OR/930JYL, CA/7UJN212,  
 18 OR/105JYL, WA/BFT3543, WA/BAE0979 and OR/235KUJ. I know from my training  
 19 and experience that individuals involved in illegal activity such as money laundering,  
 20 prostitution and sex trafficking will often use rental cars to conceal and disguise their  
 21 activity from law enforcement. By renting rental cars an individual can constantly switch  
 22

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23 <sup>6</sup> Notably, on January 20, 2017, Ladeja Nelson also opened up a U.S. Bank account ending in  
 24 7348. Nelson listed her employment as a student with an address of 6727 SE 66<sup>th</sup> Avenue,  
 25 Portland, OR 97206. During my review of Nelson's U.S. Bank account ending in 7348, I noted  
 26 that from January 20, 2017 through December 15, 2017, Nelson had cash deposits totaling  
 27 \$12,410.00, which I know to be inconsistent with a student. Furthermore, I noted the deposits  
 28 were often in round, whole dollar amounts, which I know to be consistent with illicit funds such  
 as proceeds from prostitution.

1 out vehicles in order to avoid law enforcement tracking their movements. In this  
 2 instance, I know NEWCOMB used these rental cars during a period of time Baker was  
 3 actively renting hotel rooms.

4 47. I also reviewed transactional records from Baker's account for January  
 5 2018 through April 30, 2018, which showed a pattern of Baker depositing cash and then  
 6 renting hotel rooms predominantly in the Portland metro area, consistent with  
 7 prostitution-type activity. A summary of the pertinent activity is below:<sup>7</sup>

8 January 16, 2018 – Deposit of \$140.00  
 9 January 16, 2018 – Debit Card – Priceline.com – Hotel Rooms - \$87.98  
 10 January 18, 2018 – Deposit of \$150.00  
 11 January 19, 2018 – Debit Card – Priceline.com – Hotel Rooms - \$101.97  
 12 January 22, 2018 – Deposit - \$90.00  
 13 January 22, 2018 – Priceline.com – Hotel Rooms - \$83.98  
 14 March 16, 2018 – Deposit of \$160.00  
 15 March 17, 2018 – Priceline.com – Hotel Rooms - \$129.96  
 16 March 19, 20-18 – Rivers Edge Hotel - \$30.00<sup>8</sup>  
 17 March 31, 2018 – Deposit - \$171.00  
 18 April 2, 2018 – Priceline.com – Hotel Rooms - \$119.98  
 19 April 2, 2018 – Hotel Deluxe, Portland, OR - \$23.06<sup>9</sup>  
 20 April 5, 2018 – Priceline.com – Hotel Rooms - \$72.97  
 21 April 6, 2018 – Deposit - \$180.00  
 22 April 7, 2018 – Priceline.com – Hotel Rooms - \$127.96  
 23 April 9, 2018 – Hotel Deluxe, Portland, OR - \$11.00  
 24 April 14, 2018 – Deposit \$110.00  
 25 April 16, 2018 – Priceline.com – Hotel Rooms - \$97.97  
 26 April 18, 2018 – Deposit \$150.00  
 27 April 19, 2018 – Priceline.com – Hotel Rooms - \$74.95  
 28 April 23, 2018 – Deposit \$170.00  
 April 23, 2018 – Priceline.com Hotel Rooms - \$82.96  
 April 24, 2018 – Deposit \$140.00

<sup>7</sup> The transactions for Priceline.com often do not identify the actual hotel name and/or city and state for the hotel.

<sup>8</sup> I reviewed records from River's Edge Hotel & Spa dated March 16, 2018 and noted that Passionate Baker rented a hotel room for one night in Portland, Oregon.

<sup>9</sup> I reviewed the hotel room folio from Hotel deLuxe in Portland, OR, which identified Baker having rented a hotel on March 31, 2018 through April 6, 2018.

1 April 25, 2018 – Priceline.com – Hotel Rooms - \$118.13  
 2 April 25, 2018 – Embassy Suites, Portland, OR - \$25.50  
 3 April 25, 2018 – Deposit \$200.00  
 4 April 26, 2018 – Hotel Rose, Portland, OR - \$11.53<sup>10</sup>  
 5 April 26, 2018 – Priceline.com – Hotel Rooms - \$117.96  
 6 April 27, 2018 – Deposit \$95.00  
 7 April 27, 2018 – Aladdin Motor In, Beaverton, OR - \$92.24  
 8 April 30, 2018 – Deposit - \$130.00  
 9 April 30, 2018 – Priceline.com – Hotel Rooms - \$112.23

10 48. On June 13, 2018, Baker had a charge to Priceline.com for \$116.97. I  
 11 noted an incidental charge of \$22.00 at the Crowne Plaza in Portland, OR also on June  
 12 13, 2018, suggesting that the Priceline.com booking was for the Crowne Plaza in  
 13 Portland, OR. Notably, as detailed below, Baker applied to lease the SUBJECT  
 14 PREMISES on or about June 6, 2018. This furthers Investigators' belief that  
 15 NEWCOMB is trafficking Baker interstate. The fact that Baker maintains a residence in  
 16 close proximity to Portland, across state lines in Vancouver, WA, also substantiates  
 17 Investigators' belief that Baker is renting these hotel rooms for prostitution.

18 49. The activity in Baker's Rivermark Community Credit Union account  
 19 became dormant in 2018.

20 50. In January 2019, activity resumed in Baker's Rivermark Community Credit  
 21 Union account, again with multiple cash deposits followed by bookings at hotels in  
 22 Oregon. I noted that on February 20, 2019, Baker received a deposit from Paypal for  
 23 \$1,690, immediately followed by a cash withdrawal of \$1,690. On March 2, 2019, Baker  
 24 received a deposit from Paypal of \$643.50 immediately followed by a \$450 cash  
 25 withdrawal. On April 19, 2019, Baker received another deposit from Paypal for \$643.50.  
 26 On May 15, 2019 Baker received a Paypal deposit of \$1,240 and on May 25, 2019, she  
 27 received another Paypal deposit of \$990.

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28 <sup>10</sup> I also reviewed records from Hotel Rose and noted that Baker reserved a hotel room on April  
 23, 2018 for one night in Portland, Oregon.

1        51. Based on my training and experience, I know Paypal is a common method  
 2 to transfer money between “johns” and prostitutes. In many instances, prostitutes prefer  
 3 to receive an up-front payment via Paypal that is typically coded as a “donation.”  
 4 Oftentimes, the up-front payment is a portion of the total price for services rendered. The  
 5 use of Paypal for prostitution services (1) reduces the possibility of the john getting  
 6 robbed of cash, (2) creates the appearance of a legitimate business transaction, and (3) is  
 7 a way to reduce the risk that the john is a law enforcement officer as it can be difficult for  
 8 law enforcement agencies to set up Paypal accounts in false and/or fictitious names.

9        52. My investigation has shown Baker’s Paypal deposits are typically higher  
 10 than a typical payment for a prostitution date because I believe these payments are from a  
 11 repeat customer. Baker’s only source of Paypal deposits is from a male D.H. for the time  
 12 period of December 2018 through April 2019.<sup>11</sup> I reviewed Paypal records for D.H. for  
 13 the time period of November 2017 through April 2019 and noted that D.H. almost  
 14 exclusively utilized his Paypal account to make payments to a handful of women over the  
 15 course of approximately 18 months of varying amounts, which I believe is consistent  
 16 with my theory that D.H. is a consistent customer for these prostitutes and Baker.

17        53. On May 30, 2019, Baker had a charge at the Red Lion on the River for  
 18 \$125.68, which I know to be in Portland, OR. By this time, Baker resided at the  
 19 SUBJECT PREMISES in Vancouver, WA, demonstrating another instance of interstate  
 20 transportation of Baker to engage in prostitution activity.

21        54. On June 18, 2019, Baker had a charge at the Holiday Inn for \$124.97.

22        55. This pattern of activity continued in the most recent Rivermark Community  
 23 Credit Union account for September 2019. For example, on September 3, 2019, Baker  
 24 received a deposit of \$693 and \$212.85 from Paypal into her Rivermark Credit Union  
 25 XXX1000-2. On September 7, 2019, Baker had charges on her Rivermark Credit Union  
 26

27 \_\_\_\_\_  
 28 <sup>11</sup> Investigators only have Paypal records through April 2019.

1 XXX1000-2 to Comfort Suites in Clackamas, OR for \$130.36. On September 9, 2019,  
2 Baker had another charge of \$300.52 at Hampton Inn in Clackamas, OR to the account  
3 XXX1000-2.

4 56. Based on my training and experience, I believe that Baker's bank account  
5 activity is consistent with NEWCOMB's trafficking of Baker for purposes of prostitution  
6 and use of Baker's account to launder the proceeds.

7 *A.G.'s Bank Account*

8 57. With respect to A.G., according to Rivermark Community Credit Union  
9 records, on February 13, 2019, A.G. and K.C., both believed to be born in 2000, entered  
10 Rivermark Community Credit Union together and attempted to open up separate  
11 Rivermark Community Credit Union accounts. The credit union declined K.C.'s  
12 membership application due to her outstanding debt at a separate financial institution, but  
13 A.G. successfully opened up her account.

14 58. Rivermark Community Credit Union bank personnel noted odd behavior  
15 from A.G. as A.G. kept asking if she would receive a debit/credit card and if it would be  
16 available to use. A.G. was constantly on her phone and took a phone call during the  
17 application process. A.G. and K.C. both departed the credit union in a Hyundai Sonata  
18 OR/089LCT registered to Passionate Baker, based on a Riverview Community Credit  
19 Union report.

20 59. I reviewed A.G.'s Rivermark Community Credit Union, Membership  
21 #XXXXX090-2, and noted that the transactional history is consistent with prostitution  
22 activity directed by NEWCOMB. On the day A.G. opened the account, a total of  
23 \$215.00 in cash was deposited in two separate transactions with the first transaction of  
24 \$35.00 cash deposit followed by a \$180.00 cash deposit a short time later. I reviewed  
25 ATM photos and noted NEWCOMB deposited the \$180.00 in cash into A.G.'s bank  
26 account on February 13, 2019. NEWCOMB conducted the transaction at the ATM drive  
27 up window and while I could not identify a license plate, based on the color and model of  
28

1 the vehicle it appeared to be the same Hyundai Sonata OR/089LCT registered to Baker,  
2 which A.G. and K.C. departed in after opening up A.G.'s account.

3 60. Subsequent deposits and charges confirmed my suspicion that A.G.'s  
4 account is being used for prostitution activity. For example, on February 14, 2019, a  
5 debit card charge was made at Sheraton Hotel for \$123.78.

6 61. On February 14, 2019, a \$200 ATM deposit was made followed by  
7 February 15, 2019 debit card charges at Priceline Hotels in Portland, Oregon for \$116.89  
8 and Sheraton Hotel in Portland, Oregon for \$90.00.

9 62. On February 15, 2019, a cash deposit was made for \$160.00 in A.G.'s  
10 account. I noted the February 15, 2019 cash deposit of \$160.00 was conducted by  
11 NEWCOMB based on ATM photographs at approximately 8:59pm into A.G.'s  
12 Rivermark Community Credit Union Account, Membership XXXX090-2. Based on the  
13 two hotel charges for this same date, I believe the evening deposit is consistent with  
14 NEWCOMB depositing prostitution proceeds from earlier that day.

15 63. On February 19, 2019, an additional Priceline Hotel charge was made to  
16 A.G.'s account at the Comfort Inn totaling \$117.96. I noted an additional debit card  
17 charge of \$10.00 at the Comfort Inn & Suites in Portland, OR; therefore, I believe the  
18 Priceline Hotel charge of \$117.96 was at a Comfort Inn & Suites in Portland, Oregon.

19 64. A.G.'s Rivermark Community Credit Union account closed in August  
20 2019.

21 65. Based on my training and experience, and knowledge of this investigation,  
22 I believe A.G.'s bank account activity was consistent with prostitution activity, as profits  
23 from suspected prostitution dates were deposited into the account and then the account  
24 funds were used to book hotel rooms for prostitution activity. I further believe that  
25 NEWCOMB deposited illicit funds directly into A.G.'s account, as opposed to his own  
26 account, to conceal and disguise the source of the funds.

**May and June 2019 Evidence that NEWCOMB Trafficked A.G. and Nelson**

66. I reviewed a Portland Police Bureau (PPB) report of a May 30, 2019 armed robbery of Ladeja Nelson and A.G. Nelson told officers that she (Nelson) has known A.G. for the past six months and they have become close friends and that A.G. spent the night at her apartment in Oregon the night of the robbery. On June 6, 2019, Detective Kenneth Reynolds with PPB went to an address in an attempt to interview A.G., but she was not present. However, PPB detectives interviewed Jamesha Washington, mother of A.G. Washington stated that A.G.'s boyfriend, Stevie NEWCOMB, was prostituting A.G. On June 25, 2019, PPB detectives contacted Stephanie Avington related to the purported robbery of Nelson and A.G. Avington is the mother of Nelson. Avington also stated that Steven NEWCOMB is pimping out Nelson.

67. On June 28, 2019, I reviewed the hotel folio from the Holiday Inn Portland Airport and noted Ladeja Nelson rented a hotel room through Priceline. Holiday Inn Portland Airport personnel provided video, which showed Ladeja Nelson checking into the Holiday Inn front desk. Following completion of the check-in process, Nelson was met at the front door by a young woman holding a child's hand. The young woman appeared to be A.G. The video showed Nelson taking A.G. and the young child towards the elevator. A different video camera showed Nelson, A.G. and the young child exiting the elevator onto the floors that contain hotel rooms.

68. Based on my training and experience, I believe that Nelson likely acts as the primary woman assisting NEWCOMB in his prostitution enterprise. The common street vernacular for this role is the "bottom bitch." I know pimps commonly use a primary woman to assist the pimp in recruiting new prostitutes, training prostitutes, and collecting money from other prostitutes who work under the control of the pimp. In this case, Nelson checked into the Holiday Inn and was met by a young woman (A.G.) who posted online as an escort. The video shows both of them exited the hotel elevator

1 towards the hotel rooms where I believe Nelson set up A.G. to participate in prostitution-  
2 related activity.

3 **A.G., K.C. and Nelson in Prostitution-Related Postings as of October 2019**

4 69. When I reviewed the Rivermark Community Credit Union Membership  
5 Applications for A.G. and K.C., I identified a phone number used by K.C. ending in 4307  
6 (hereinafter, "K.C.-4307") and a phone number for A.G. ending in 5917 (hereinafter,  
7 "A.G.-5917"). I reviewed phone toll records for A.G.-5917 and a cellphone used by  
8 NEWCOMB, (503) 757-0850 ("NEWCOMB-0850") for the time period of February 1,  
9 2019 through April 17, 2019. I noted over 1,300 contacts between A.G.-5917 and  
10 NEWCOMB-0850. I noted over thirty contacts between A.G.-5917 and NEWCOMB-  
11 0850 on February 13, 2019, the day that A.G. and K.C. were at Rivermark Community  
12 Credit Union to open and/or attempt to open their bank accounts. This is consistent with  
13 my belief that NEWCOMB acted as a pimp for A.G. and K.C. during this time period.

14 70. I also conducted a Google search of "K.C.-4307" and found that this phone  
15 number is affiliated to postings for an 18-24 year-old escort. These postings dated back  
16 to March 2019 and were as recent as October 31, 2019. I reviewed the postings and  
17 found explicit images for what appears to be K.C., A.G., or Nelson, all using "K.C.-  
18 4307" as their contact number. The fact that postings are made for all three women under  
19 this same phone number is consistent with Investigators' theory that NEWCOMB traffics  
20 all three women.

21 71. I reviewed the actual written messages with the photos and found the  
22 written posts to also explicitly advertise prostitution. For example, the April 19, 2019  
23 post for what appears to be Nelson, A.G. or K.C. or some combination of the three  
24 women states, "Hey babes I'm Chanel. I'm horny and ready to fuck. Come have some  
25 wet and wild fun with me. Im very professional. I love doing what I do just as much as  
26 you love doing me." Another example is the October 17, 2019 posting on Skip the  
27 Games for what appears to be A.G. and an unknown white female, which states, "Hey  
28

1 loves Im Mila come spend some time with me. Let me help you unwind from a long day.  
 2 Clean, fun, and sensual. Dont hesitate to message me. Ask about my duos. We have all  
 3 the fun!!” The October 17, 2019 posting lists various sexual activities the women  
 4 perform, consistent with prostitution. Based on the explicit photos and written messages,  
 5 I believe these postings are advertising K.C., A.G., and what appears to be Nelson for  
 6 prostitution. Variants of these postings were continuously posted for the month of  
 7 October 2019.

8 **Toll Analysis and GPS Data Confirms NEWCOMB’s Continued Trafficking of**  
 9 **K.C., A.G., Nelson and Baker**

10 72. I have obtained and reviewed toll records for (503) 358-0057, a phone  
 11 identified as being used by NEWCOMB (NEWCOMB-0057). This phone number was  
 12 initially identified using common call analysis, which is simply identifying a series of the  
 13 top callers (highest volume of calls from specific phone numbers) to NEWCOMB’s old  
 14 phone number (503) 890-9441, and comparing those top callers to the new suspected  
 15 number. Through analysis of these top callers in September 2019, law enforcement  
 16 identified NEWCOMB-0057 as the likely replacement phone for NEWCOMB-9441.  
 17 Physical surveillance coupled with geo-location data for NEWCOMB-0057 confirmed  
 18 that NEWCOMB’s physical movement was in tandem with the geo-location data for  
 19 NEWCOMB-0057.

20 73. NEWCOMB-9441 was identified as NEWCOMB’s number based on a  
 21 common call analysis in which we identified the top callers for NEWCOMB’s prior  
 22 phone of (503) 757-0850. Furthermore, the subscriber for (503) 890-9441 was listed as  
 23 Family Bizz-Ness, LLC, LLC, which I know to be a company registered to Steven  
 24 NEWCOMB with the Oregon Secretary of State. NEWCOMB dropped or ceased using  
 25 NEWCOMB-9441 on August 31, 2019.

26 74. NEWCOMB’s prior number of (503) 757-0850 was identified following a  
 27 Vancouver Police Department contact, in which (503) 757-0850 was listed as  
 28

1 NEWCOMB's cellular telephone number. Additionally, on May 9, 2019, the Honorable  
 2 John V. Acosta, U.S. Magistrate Judge for the District of Oregon signed a geo-location  
 3 warrant for (503) 757-0850. Physical surveillance coupled with geo-location data for  
 4 (503) 757-0850 confirmed that NEWCOMB's physical movement was in tandem with  
 5 the geo-location data for (503) 757-0850.

6 75. With respect to NEWCOMB's current phone, NEWCOMB-0057, I know  
 7 that the top caller for NEWCOMB-0057 is Baker's cellular telephone (503) 490-2023,  
 8 demonstrating that NEWCOMB maintains an active relationship with Baker, which is  
 9 consistent with my theory that NEWCOMB traffics Baker. The Regency Apartments  
 10 identified Baker's current phone number as (503) 490-2023, based on calls from Baker to  
 11 office staff at Regency Apartments. Between August 31, 2019 and October 16, 2019,  
 12 Baker and NEWCOMB had phone contact in excess of 500 times.

13 76. Additionally, toll data indicated multiple phone contacts between  
 14 NEWCOMB and Baker on the September dates on which Baker rented local area hotel  
 15 rooms in Clackamas, OR, per Baker's bank account records, furthering my belief that  
 16 NEWCOMB is trafficking Baker.

17 77. With regard to K.C.-4307, NEWCOMB's phone does not show phone  
 18 contact with K.C.-4307. However, based on my training and experience, and knowledge  
 19 of this case, I do not believe that is unusual. I believe that K.C.-4307 is likely used to  
 20 post and contact johns, and that the women use separate phones to contact NEWCOMB.  
 21 This is common practice in sex trafficking relationships and is done to isolate the pimp  
 22 from any connection to the phone number used to contact johns or post ads. In fact,  
 23 when K.C.'s banking activity tied to NEWCOMB in February 2019, as described above  
 24 starting at ¶ 56, there were only a few phone calls between NEWCOMB and K.C. using  
 25 the phone number she had to open the bank account.<sup>12</sup>

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26  
 27 <sup>12</sup> Nelson and A.G. dropped their phones along with NEWCOMB on August 31, 2019.  
 28 Investigators are currently working on identifying replacement phones for Nelson and A.G. The

**NEWCOMB's Ongoing Relationship With Baker**

78. Aside from the aforementioned bank records, demonstrating a relationship that dates back to January 2018, and the toll records, which show a present relationship, substantial other evidence shows that NEWCOMB is in an ongoing relationship with Baker that is consistent with sex trafficking.

79. On June 25, 2019, Vancouver Police Department personnel were dispatched to the Chevron located at 500 SE Chkalov Drive, Vancouver, WA for a medical assist and welfare check on the Mercedes-Benz. The Chevron is less than 1/4 mile from the SUBJECT PREMISES. NEWCOMB was sitting in the driver's seat. NEWCOMB told officers he was going to his girlfriend's residence, who he identified as "Passionate Davis."

80. This investigation has also revealed evidence of NEWCOMB subjecting Baker to the type of domestic violence common in pimp/prostitute relationships. In the last year, police have been contacted on multiple occasions regarding domestic disputes between Passionate Baker and Steven NEWCOMB.

81. On January 5, 2019, Baker told Portland Police that while riding in a vehicle with NEWCOMB, NEWCOMB punched her in the face and tried to choke Baker with two hands. Baker threw herself out of the moving vehicle.

82. On March 13, 2019, Vancouver Police Department were called to the SUBJECT PREMISES in Vancouver, WA due to a verbal argument between Baker and NEWCOMB.

83. On April 24, 2019, Portland Police were called to a domestic disturbance at 13028 SE Foster Road, Apt. 16, Portland, Oregon. Baker told officers that NEWCOMB hit her several times and he told NEWCOMB's brother to go downstairs and get a gun. NEWCOMB's brother returned with a small blue handgun and NEWCOMB

fact that NEWCOMB, Nelson, and A.G. dropped their phones around the same time furthers Investigators' belief that they are engaged in illicit activity together.

1 threatened Baker with the gun until De'Osha McDonald, the resident of the apartment,  
2 contacted Portland Police Bureau. NEWCOMB departed from the apartment prior to the  
3 arrival of officers.

4 84. In addition, although not involving Baker, NEWCOMB admitted to  
5 possession of two loaded handguns during a May 25, 2019 PPB traffic stop of the  
6 Mercedes-Benz.

7 85. I know that individuals involved in promoting prostitution, sex trafficking,  
8 or engaging in a prostitution enterprise often exert influence over women involved in the  
9 prostitution activities by threats of force or coercion. I believe that NEWCOMB has  
10 threatened Baker on multiple occasions including with a handgun, which is indicative of  
11 attempting to control and exert influence over Baker as part of NEWCOMB's prostitution  
12 enterprise. I know that pimps commonly carry firearms to exert control over their  
13 prostitutes as well as for protection against "johns" or other individuals capable of  
14 committing harm to the prostitute.

15 **Evidence that NEWCOMB Uses the SUBJECT PREMISES**

16 86. I reviewed the lease application for the SUBJECT PREMISES dated June  
17 6, 2018. Baker listed her employment with a company called Family Bizz-Ness, LLC  
18 and her occupation as a promoter/event scheduler with a \$3,400 monthly income. Family  
19 Bizz-Ness, LLC is incorporated with the Oregon Secretary of State with Steven  
20 NEWCOMB listed as a Member/Manager of the corporation. Baker listed her supervisor  
21 as "Steven," believed to be Steven NEWCOMB.

22 87. Notably, a review of rental records demonstrated that Baker has made each  
23 monthly rent payment with a Western Union Fred Meyer money order or Money Gram  
24 (monthly rent is \$1,269 per month), which I know to be commonly purchased with cash.  
25 I confirmed with Regency Apartments that cash payments are not an acceptable method  
26 of making monthly rent payments. Based on my training and experience, I believe this to  
27  
28

1 be further evidence that Baker does not have a legitimate source of income and therefore  
2 purchases money orders with prostitution proceeds in order to pay her monthly rent.

3 88. Since March 2019 and continuing to the present, Investigators have  
4 observed Baker at the SUBJECT PREMISES. Starting in October 2019, Investigators  
5 reviewed the entry records for the Regency Apartments security gate and noted Baker has  
6 entered her unique access code on multiple occasions consistent with residing at the  
7 SUBJECT PREMISES.<sup>13</sup> Investigators have not seen the Hyundai Sonata registered to  
8 Baker at the SUBJECT PREMISES.

9 89. On October 10, 2019, Hon. Jolie A. Russo, U.S. Magistrate Judge for the  
10 District of Oregon, signed a geo-location warrant for NEWCOMB-0057.

11 90. Between October 15, 2019 and November 8, 2019, NEWCOMB stayed  
12 overnight at the SUBJECT PREMISES approximately eight times. The vast majority of  
13 the remaining days NEWCOMB stayed at the Lawnfield Apartment in Clackamas, OR,  
14 but on occasion, NEWCOMB did not stay at the SUBJECT PREMISES or the  
15 Clackamas Apartment.

16 91. On October 22, 2019 at approximately 6:15am, geo-location information  
17 for NEWCOMB-0057 showed NEWCOMB's cellular telephone in close proximity to the  
18 SUBJECT PREMISES. At approximately 7:30am I drove past the SUBJECT  
19 PREMISES and noted a red Ford Focus with temporary trip permit A0011003 parked in  
20 assigned space 462. I know space 462 is associated to the SUBJECT PREMISES. I  
21 reviewed geo-location information for NEWCOMB-0057, which showed the phone  
22 arrived around 12:28am and remained at the SUBJECT PREMISES until approximately  
23 12:10pm the following afternoon. I reviewed Regency Apartment video footage of the  
24 front gate and noted at approximately 12:28am, a red Ford Focus entered the apartment  
25 complex, which is consistent with geo-location information for NEWCOMB-0057.

26 \_\_\_\_\_  
27 <sup>13</sup> Each tenant at Regency Apartments is provided with a unique electronic code to gain access to  
28 the Regency Apartments, which is a gated apartment complex.

1        92. On October 24, 2019 at approximately 5:50am, geo-location information  
2 for NEWCOMB-0057 showed the cellular phone in close proximity to the SUBJECT  
3 PREMISES. Based on my review of geo-location information, NEWCOMB had recently  
4 arrived at the SUBJECT PREMISES. I drove past the SUBJECT PREMISES and noted  
5 a black Chevrolet Tahoe with OR/286CJP parked in assigned space 462. The registered  
6 owner of OR/286CJP is Fred Baker (believed to be a relative of Passionate Baker).  
7 Based on the time of morning and proximity of NEWCOMB-0057, I believe that  
8 NEWCOMB arrived at approximately 5:50am about the time I conducted physical  
9 surveillance and remained at the SUBJECT PREMISES until around 1:32pm, consistent  
10 with staying at a secondary residence.

11        93. On October 25, 2019 at approximately 8:40am, I noted a tan Ford Taurus  
12 with temporary trip permit A0011004 was parked in front of the SUBJECT PREMISES.  
13 I subsequently reviewed Regency Apartments video and noted that on October 24, 2019  
14 at approximately 17:59pm Baker's apartment code was used to enter through the front  
15 gate of Regency Apartments. I was unable to definitively identify the driver, but the  
16 individual entered the front gate driving the tan Ford Taurus.

17        94. I noted that both the red Ford Focus and tan Ford Taurus have temporary  
18 trip permits that are one digit off, A0011003 and A0011004. I know that when Baker and  
19 NEWCOMB drove the Hyundai Sonata, that vehicle originally had an Oregon license  
20 plate OR/089LCT. However, on July 1, 2019 while conducting surveillance Investigators  
21 noticed the Oregon plate had been removed and a temporary trip permit A761394 sat in  
22 the back window. I believe that utilizing temporary trip permits is a way to conceal and  
23 disguise the registered owner of the vehicle. Moreover, individuals often remove license  
24 plates and/or utilize false trip permits when they do illegal activity to conceal their  
25 movements.

26        95. On October 26, 2019 at approximately 2:56am, geo-location data for  
27 NEWCOMB-0057 showed the phone in the area of the SUBJECT PREMISES. The  
28

1 phone stayed overnight in the area of the SUBJECT PREMISES until approximately  
2 12:07pm before eventually returning to the area of the Lawnfield Apartment in  
3 Clackamas, OR.

4 96. On November 1, 2019 at approximately 9:59pm and continuing until  
5 approximately 11:13am on November 2, 2019, geo-location data for NEWCOMB-0057  
6 showed the phone in the area of the SUBJECT PREMISES consistent with NEWCOMB  
7 having stayed the night at the SUBJECT PREMISES.

8 97. On November 3, 2019 I reviewed geo-location data for NEWCOMB-0057  
9 which showed the phone in the area of the SUBJECT PREMISES starting at 10:43pm  
10 and continuing until approximately 11:15am on November 4, 2019, which is consistent  
11 with NEWCOMB having stayed the night at the SUBJECT PREMISES.

12 98. On November 8, 2019 I reviewed geo-location data for NEWCOMB-0057  
13 which showed the phone in the area of the SUBJECT PREMISES starting at  
14 approximately 2:32am and departing at approximately 11:04am, which is consistent with  
15 NEWCOMB having stayed the night at the SUBJECT PREMISES.

16 99. Based on my review of geo-location information and surveillance, I believe  
17 that NEWCOMB is currently splitting his time between the SUBJECT PREMISES and  
18 the Lawnfield Apartment in Clackamas, OR. A search of the SUBJECT PREMISES will  
19 therefore reveal both historical and current evidence of the aforementioned crimes, as  
20 discussed above.

21 **COMMON CHARACTERISTICS OF SEX TRAFFICKERS**

22 100. Based upon my training and experience as well as through speaking with  
23 other law enforcement officers and agents who also specialize in investigating sex  
24 trafficking, I know the following:

25 a. That traffickers often recruit potential prostitutes via phased manipulation,  
26 the duration and degree of which is dictated by the personalities involved.

1       b.     That traffickers use a variety of techniques to control victims, which  
2 commonly include “finesse” (persuasion, romance, fraud, psychological trickery), debt,  
3 drugs, gorilla (coercion, physical force, threats of harm to the prostitute or other party),  
4 and/or a position of authority.

5       c.     That traffickers utilize a common dialect for the prostitution industry.

6       d.     That traffickers commonly designate a prostitute as the “second in  
7 command” of other prostitutes. This person is commonly referred to as the “bottom  
8 bitch” and is selected for a variety of reasons, such as that prostitute’s earning potential,  
9 manipulating/teaching ability, seniority within the prostitution enterprise, or effectiveness  
10 at discipline.

11       e.     That traffickers, or designated second in command, commonly educate the  
12 prostitute in aspects of the sex industry, to include what acts to perform, how much to  
13 charge, and how to detect or avoid law enforcement.

14       f.     That traffickers discipline prostitutes for a variety of transgressions,  
15 including: looking at another person who is not the trafficker, speaking to a person who is  
16 not a paying customer, failing to provide the traffickers with the total amount of money  
17 earned, attempting to contact friends/family, or escape attempts.

18       g.     That traffickers commonly seize control of personal effects (previous cell  
19 phone, identification card, money) in order to further restrict the prostitute’s willingness  
20 and/or ability to seek assistance.

21       h.     That traffickers often deliver and/or monitor prostitutes in or from vehicles.

22       i.     That it is common for traffickers to travel, or have their associate’s travel,  
23 to known regional or national areas of prostitution, to facilitate prostitution.

24       j.     That traffickers commonly provide a cellular phone to the prostitute for  
25 exclusive use during prostitution activities, and the communication via cellular phones  
26 occurs through voice, text, and photo messages, which are often coded to conceal their  
27 true meaning from others.

1 k. That, using the above-mentioned cellular phones, the prostitutes are often  
2 only allowed to communicate with the trafficker, customers, and occasionally other  
3 individuals subjected to control by the traffickers.

4 l. That the above-mentioned cellular phones possessed by the traffickers often  
5 display graphic depictions of current or previous prostitutes, or graphics glamorizing the  
6 trafficking industry, while the cellular phones possessed by the prostitute commonly  
7 display images glamorizing money. These phones also commonly display the contact  
8 phone number for the pimp/trafficker as "daddy" (i.e., "pimp daddy").

9 m. That traffickers, or their designee, commonly utilize a variety of print  
10 media (newspapers, magazines, business cards, flyers), as well as electronic media  
11 (internet websites, chat rooms and blogs) to advertise, promote, or otherwise facilitate  
12 prostitution.

13 n. That traffickers take, or cause to be taken, photographs of them, their  
14 associates, their property, cash, assets and their prostitutes. These traffickers usually  
15 maintain these photographs in their possession, particularly in their residences.

16 o. That traffickers use the proceeds of prostitution activity to present and  
17 maintain a public image, which includes currency, precious metals, jewelry, electronic  
18 devices, and vehicles, among others.

19 p. That traffickers commonly secure contraband, proceeds of prostitution  
20 activity, narcotics, weapons, and records of debts in safes located within their residences  
21 and/or storage lockers for their ready access and to conceal them from law enforcement.

22 q. That it is common for traffickers to secret contraband, proceeds of  
23 prostitution, and records of prostitution in secure locations on their person, within and  
24 around their residences, or in their vehicles, for ready access or to conceal them from law  
25 enforcement authorities.

26 r. That traffickers maintain written records, books, receipts, notes, ledgers,  
27 airline tickets, money orders, cashier's checks and other papers relating to the  
28

1 transportation, possession, recruitment, profits and information of prostitutes and/or  
2 customers. The traffickers records can be retained for long period of time including  
3 several years or back into the inception of the prostitution activity.

4 s. That the aforementioned books, records, receipts, notes, ledgers, etc., are  
5 maintained where the traffickers have ready access to them, i.e., on their persons, in their  
6 vehicles, or about their residences.

7 t. That traffickers maintain electronic records of prostitution activity and/or  
8 advertising via computer or handheld electronic device and/or electronic data storage  
9 medium.

10 u. That traffickers maintain in their residences financial type records which,  
11 when analyzed, will show that their accumulation and expenditures of money and assets  
12 substantially exceeds any legitimate income.

13 v. That traffickers maintain in their residences, vehicles and on their persons  
14 weapons (including ammunition and holsters) to protect themselves from other  
15 traffickers, apprehension by law enforcement, as well as discipline (or threat of) to  
16 prostitutes.

17 w. That traffickers frequently utilize communication devices such as cellular  
18 telephone within their trafficking business, and that they often utilize electronic  
19 equipment such as computers, currency counting machines, computer watches, and  
20 related manuals to generate, transfer, count, record, and/or store information about their  
21 trafficking activities and/or information evidencing their participation in, or gains from,  
22 their trafficking activities, and/or their financial affairs.

23 x. That persons involved in trafficking conceal on their persons, within or  
24 around their residences and vehicles, large amounts of currency, financial instruments,  
25 precious metals, jewelry, and other items of value and/or proceeds of prostitution, and  
26 evidence of financial transactions relating to obtaining, transferring, secreting, or the  
27  
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1 spending of large sums of money made from engaging in prostitution and trafficking  
2 activities.

3 y. That traffickers commonly use aliases when renting and purchasing  
4 property to conceal their conduct from law enforcement.

5 z. That traffickers very often place assets in names other than their own to  
6 avoid detection of these assets by law enforcement agencies.

7 aa. That even though these assets are in other persons' names, the traffickers,  
8 and/or associates or relatives continue to use these assets and exercise dominion and  
9 control over them.

10 bb. That when traffickers amass proceeds from prostitution, that the traffickers  
11 attempt to legitimize these profits through a variety of means.

12 cc. That to accomplish these goals, traffickers utilize tools including domestic  
13 banks and their attendant services, securities, cashier's checks, money drafts, letters of  
14 credit, brokerage houses, real estate, shell corporations, and business front.

15 **ELECTRONIC ITEMS**

16 101. As outlined above the attached affidavit seeks to seize electronic items from  
17 the SUBJECT PREMISES as potential evidence of the aforementioned crimes. This  
18 warrant seeks to seize these electronic items and subsequent search warrants may be  
19 written in the District of Oregon to search and seize evidence from the electronic items  
20 taken from the SUBJECT PREMISES.

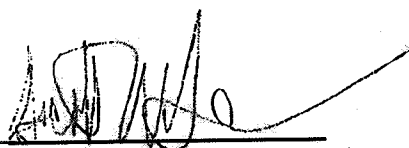
21 **REQUEST FOR SEALING**

22 102. It is respectfully requested that the Court issue an order sealing, until  
23 further order of the Court, all papers submitted in support of the requested search  
24 warrants, including the application, this affidavit, the attachments, and the requested  
25 search warrants. I believe that sealing these documents is necessary because the  
26 information to be seized is relevant to an ongoing investigation, and any disclosure of the  
27 information at this time may endanger the safety of cooperating individuals, cause the  
28

1 flight from prosecution of co-conspirators, and otherwise jeopardize the ongoing  
 2 investigation. Premature disclosure of the contents of the application, this affidavit, the  
 3 attachments, and the requested search warrant may adversely affect the integrity of the  
 4 investigation.

### 5 CONCLUSION

6 103. Based on the foregoing, I respectfully submit that there is probable cause to  
 7 search the location described in Attachment A, for evidence, fruits, and instrumentalities  
 8 of transporting an individual interstate with intent to engage in prostitution in violation of  
 9 Title 18 U.S.C. § 2421A; facilitating, managing and promoting prostitution enterprise in  
 10 violation of Title 18 U.S.C. § 1952; sex trafficking in violation of Title 18 U.S.C. § 1591,  
 11 and money laundering in violation of Title 18 U.S.C. § 1956, as further described in  
 12 Attachment B.

13  
 14   
 15 SCOTT MCGEACHY, Special Agent  
 16 IRS Criminal Investigation

17  
 18 The above-named agent provided a sworn statement attesting to the truth of the  
 19 foregoing affidavit by telephone on the 18<sup>th</sup> day of November, 2019.

20  
 21   
 22 DAVID W. CHRISTEL  
 23 United States Magistrate Judge  
 24  
 25  
 26  
 27  
 28

**ATTACHMENT A**  
**Places to be Searched**

The property to be searched is located at 11301 SE 10<sup>th</sup> Street, Building Q111, Vancouver, WA 98664 (the "SUBJECT PREMISES"). The SUBJECT PREMISES is located in an apartment complex described as the Regency Apartments, which is located off of 10<sup>th</sup> Street. To locate the apartment, an individual would enter through a security controlled gated arm and drive to the southwest corner of the apartment complex, where Building Q is located. Unit 111 is located on the bottom floor, southwest corner. The apartment complex is light grey in color bearing a flat roofline.



**ATTACHMENT B**  
**Items to be Seized**

The items to be searched for, seized, and examined, are those items on the premises located at 11301 SE 10<sup>th</sup> Street, #Q111, Vancouver, WA 98664, referenced in Attachment A, that contain evidence, contraband, fruits, and instrumentalities of violations of transporting an individual interstate with intent to engage in prostitution in violation of Title 18 U.S.C. § 2421A; facilitating, managing and promoting a prostitution enterprise in violation of Title 18 U.S.C. § 1952; sex trafficking in violation of Title 18 U.S.C. § 1591 and money laundering in violation of Title 18 U.S.C. § 1956.

The items to be seized cover the period December 22, 2014 through the date of the execution of the search warrant are as follows:

- a. Books, records, receipts, notes, ledgers, and other documents relating to financial transactions to facilitate sex trafficking, prostitution, and money laundering;
- b. Personal books and papers reflecting names, addresses, telephone numbers, articles of clothing, photos and other contacts for the purpose of sex trafficking, prostitution and money laundering;
- c. Financial and business records and personal objects relating to sex trafficking, prostitution, money laundering and expenditures of money and wealth, to-wit: money orders, wire transfer records, cashier's checks and receipts, checks, bank account records, passbooks, tax records, safe deposit box keys, Paypal records and checkbooks, title files, vehicle purchases, apartment leases, business license records, pay and owe records and check registers, as well as precious metals/jewelry such as gold, silver, diamonds, Rolex watches, earrings, necklaces, etc.;
- d. Documents indicating travel in interstate and foreign commerce, to include airline tickets, notes and travel itineraries; airline schedules; bills; charge card receipts; hotel, motel, and car rental statements; correspondence with travel agencies and other travel-related businesses; airline, rent-a-car, and hotel frequent flier or user cards and

1 statements; passports and visas; telephone bills; photographs of foreign locations; and  
2 papers relating to domestic and international travel;

3 e. Documents, photographs, and videos related to sex trafficking, to include  
4 copies of postings for prostitution, trafficking manuals, diaries, telephone records,  
5 provocative clothing, condoms, lubricants and sex paraphernalia.

6 f. Cellular telephones, Ipads, computers, thumb drives, CD/DVD's other  
7 electronic communication devices which may constitute evidence of participation in sex  
8 trafficking, prostitution, operating a prostitution enterprise and money laundering;

9 g. Items of personal property that tend to identify the person(s) in residence,  
10 occupancy, control, or ownership of the premises, including canceled mail, deeds, leases,  
11 rental agreements, photographs, personal telephone books, diaries, utility and telephone  
12 bills, statements, identification documents, escrow documents and keys;

13 h. Financial profits, proceeds and instrumentalities of sex trafficking,  
14 prostitution and money laundering, including U.S Currency, gold watches, rings,  
15 necklaces, tennis bracelets; and

16 i. Firearms and other dangerous weapons and ammunition and firearm  
17 accessories.